

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
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Docket No. 79-1-100-1
PROPOSED RULES - since notice being sent



Secretary of the Commission
Attention: Docketing and Services Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: (1) NUREG-0610, "Draft Emergency Action Level Guidelines for Nuclear Power Plants".

Gentlemen:

Comments on NUREG-0610
"Draft Emergency Action Level Guidelines for Nuclear Power Plants"

Included in Reference (1), NUREG-0610, was a request for comments pertaining to the draft Emergency Action Level Guidelines.

Northeast Utilities Service Company (NUSCO) provides the following comments on the Reference (1) NUREG:

EXAMPLE INITIATION CONDITIONS - NOTIFICATION OF UNUSUAL EVENT:

Change Item to Read:

Reason:

- | | |
|---|---|
| (1) ECCS initiated and determined not to be spurious. | If spurious and cause known, no further actions would occur. |
| (2) Radiological effluent technical specifications exceeded with potential to continue and/or which require abnormal offsite surveillance in excess of technical specification sampling requirements. | Small increases above limits or minor "single shot" releases with no continuing potential have no need of the emergency plan response organization. |
| (6) Failure of a Safety or Relief to close on a non-isolable system to the reactor coolant system or other system potentially significant to reactor or plant safety. | Not all relief valves are on safety or significant systems. |
| (14) e) Eliminate turbine failure. | This is a very "quick" event. The facility will or will not have an emergency. There is no need for a unusual event notification. |

1761 357

Acknowledged by card... *dlh 12/15/79*

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- (15) Other plant conditions exist that warrant increased awareness on the part of State and/or local offsite authorities or involve other than normal controlled shutdown, (e.g., cooldown rate exceeding technical specification limits, pipe cracking found during operation).

The intent is to be more specific. Many plant shutdowns will be due to technical specifications but will have no significance, i.e., loss of one safety train requiring shutdown in 72 hours. This would be reported via normal channels as information and use of emergency plan system would have no benefit. The general intent of notification of unusual event is very good if properly used. It is important to keep Notification of Unusual Event in perspective within the Emergency Plan. Other report requirements still exist for information flow in the proper non-emergency atmosphere.

CLASS

NOTIFICATION OF UNUSUAL EVENT:

Purpose:

The purpose should be changed to the following:

- (1) assure that first step in any response later found to be necessary has been carried out.
- (2) provide current information on unusual events which could indicate a potential degradation of level of safety in the facility.
- (3) Delete (3).

Reason:

This change will clarify what this unusual event is actually doing. It is not a test of communications.

Testing of communications can be accomplished in different ways and can be of different scopes, this EAL being one of them.

The providing of current information should only be on items which could have future near-term emergency significance.

1761 358

Release Potential:

Change Release Potential to the following:

No releases of material in excess of technical specification limits are expected unless further degradation of the safety system occurs.

This change is to clarify intent and make it compatible with existing specifications. Some incidents may have normal expected releases but would be within normal limits and monitored by existing programs.

LICENSEE ACTION:

Change Item (1) to the following:

- (1) Inform State and Local Offsite authorities of nature of unusual event after immediate corrective actions have been taken and initial assessment has been completed.

Reason:

The "as soon as discovered" is too early. The operator will be busy controlling incident/event for several minutes and then must have some thought time. There will be no useful advantage to immediate calling in each case as:

- many more reports will be received than are warranted by premature calling (i.e., scatter approach).
- information may be incorrect.

Change Item (2) to the following:

- (2) Augment on-shift resources if required.

It may not be necessary to augment on-shift resources in many instances.

ALERT

Purpose:

Item change to the following:

Eliminate Item (3) of the purpose.

1761 359

Reason:

This is not a test but an event. Every event should be evaluated to eliminate weak areas and reinforce strong ones but that is not the purpose and should not be stated as such.

EXAMPLE INITIATING CONDITIONS

Item changed to:

- | | |
|--|---|
| (11) Failure of the reactor protection system to initiate and complete a scram which fails to bring the reactor subcritical. | In example given, the reactor was in a safe state. Therefore, no emergency action was required. |
| (14) Eliminate. | No useful purpose. Accident is not eminent and actions would complicate repair. |
| (16) Ongoing security compromise which could cause loss of control of facility or part of the facility. | This is to define the degree of security problems which require action. |

SITE EMERGENCY

Purpose:

Change item to:

Purpose

- | | |
|---------------|---|
| Eliminate #5. | This is not a test but an event. Every event should be evaluated to eliminate weak areas and reinforce strong areas but that is not the purpose and should not be stated as such. |
|---------------|---|

EXAMPLE INITIATING CONDITIONS

Change item to:

- | | |
|---|---|
| (11) All alarms lost for more than 15 minutes and transient is in progress. | This condition could cause a probable increase to safety of the public. |
|---|---|

In addition, it is suggested that the titles of the middle two EAL's be re-considered. The intent as we understand it is to create EAL's that group events into an ascending order of seriousness of consequences. All EAL's (except the first) involve radiation releases. The word "Alert" usually implies to most people impending problems/take note/standby. The use of "Site" implies a distance boundary for the containment of the events consequences (a carryover from the old Regulatory Guide 1.101). A letter or color code designation might be more appropriate if adequate word titles cannot be picked.

1761 360

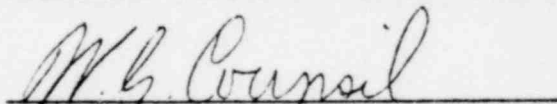
The Environmental Protection Agency's, Protective Action Guides (1975) determine appropriate actions such as take shelter, access control, or evacuation, based on projected dose levels. There is a basis for these criteria. Many state and town plans with NRC concurrence utilize the EPA criteria for their response actions. In addition, the classification of events (in some of these plans) is based on the EPA's criteria of projected dose.

The State and Local Offsite Authority Actions for the EAL's proposed in NUREG-0610 appear to ignore the presence of the EPA's criteria and its utilization in these state/town plans. These new EAL's will create a significant problem for these state and town agencies. It also appears to remove a "dose level-response" rationale from the actions required to be taken by these agencies.

We trust these comments will be useful in the development of Emergency Action Level Guidelines.

Very truly yours,

NORTHEAST UTILITIES SERVICE COMPANY



W. G. Council
Vice President